

UNITED STATES DISTRICT COURT
for the
Eastern District of Michigan

United States of America

v.

Erick Lionel MILLER

Case No. Case: 2:23-mj-30459
Assigned To : Unassigned
Assign. Date : 11/20/2023
USA V. SEALED MATTER (CMP)(CMC)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of December 8, 2021 in the county of Wayne in the
Eastern District of Michigan, the defendant(s) violated:

<i>Code Section</i>	<i>Offense Description</i>
21 U.S.C. § 841(a)(1)	Possession with intent to distribute controlled substances (cocaine)

This criminal complaint is based on these facts:

Continued on the attached sheet.



Complainant's signature

Sworn to before me and signed in my presence
and/or by reliable electronic means.

Date: November 20, 2023

City and state: Detroit, Michigan



Judge's signature

Hon. Kimberly G. Altman, U.S. Magistrate Judge

Printed name and title

AFFIDAVIT IN SUPPORT OF A CRIMINAL COMPLAINT

I, Keith A. Humphries, being duly sworn on oath, state as follows:

1. I am a United States Postal Inspector assigned to the Allen Park Domicile of the Detroit Division of the U.S. Postal Inspection Service (USPIS). I am sworn and empowered to investigate criminal activity involving or relating to the U.S. Postal Service. Currently, I am assigned to investigate the unlawful transportation of contraband, including those covered under Title 21 United States Code, through the United States Mail. I have been a Postal Inspector since March 2022. Prior to becoming a United States Postal Inspector, I was employed as a Special Agent with the Naval Criminal Investigative Service from December 2014 until March 2022. I am a graduate of the Federal Law Enforcement Training Center's Criminal Investigator Training Program, Uniformed Police Training Program, as well as the United States Secret Service's Uniformed Division Training Program and NCIS' Special Agent Basic Training Program. Additionally, I have been trained in narcotic recognition, drugs of abuse, undercover operations, proactive criminal operations, counterintelligence, and advanced interviewing techniques. Since joining the United States Postal Inspection Service, I have received additional training in the detection and investigation of prohibited mailing offenses. My additional training includes working with

experienced U.S. postal inspectors in the identification and interdiction of mailed parcels containing contraband. I have personally participated in over 25 suspected parcel investigations that have resulted in seizures of contraband. As part of my duties, I investigate incidents wherein the United States mail system is used for the purpose of transporting non-mailable matter, including controlled substances such as marijuana, cocaine, methamphetamine, and heroin, in violation of Title 21, United States Code, Sections 841(a)(1), 846, 843(b), and substances mailed in violation of Title 18, United States Code, Section 1716.

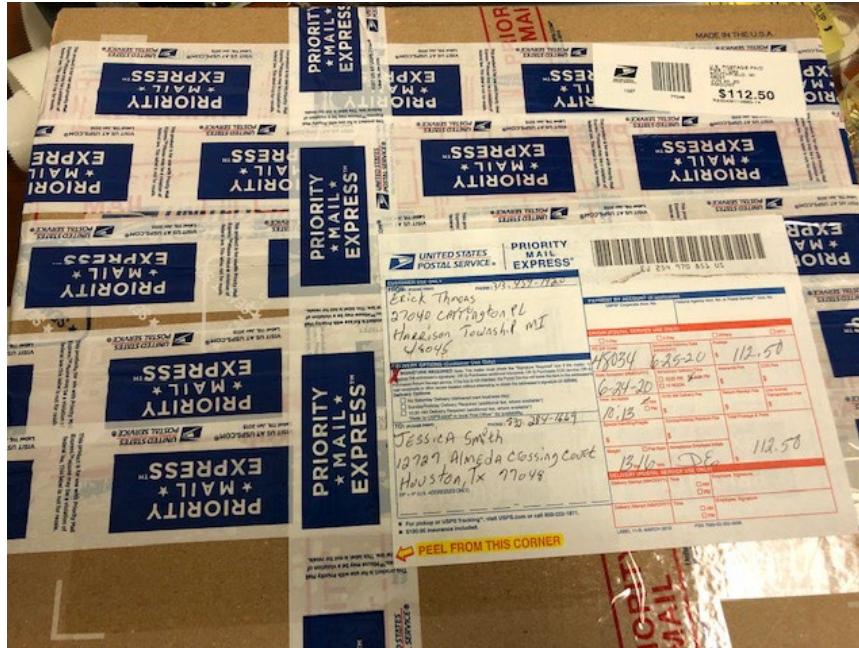
2. Because this affidavit is being submitted for the limited purpose of securing a criminal complaint and arrest warrant, I have not included each and every fact known to me concerning this investigation. I have set forth only those facts that I believe are necessary to establish probable cause to believe that Erick Lionel MILLER, DOB: XX-XX-1976 committed a violation of 21 U.S.C. § 841 (a) (1) Possession with Intent to Distribute Controlled Substances (cocaine).

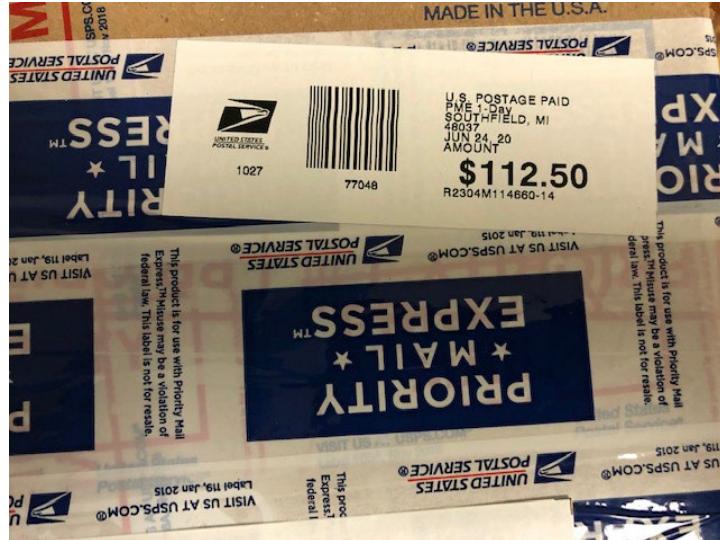
BACKGROUND OF INVESTIGATION

I. Interdiction Re. Parcel EJ 254 970 851

3. On June 24, 2020, postal inspectors interdicted outbound parcel EJ 254 970 851, while conducting outbound parcel interdiction in Allen Park, MI. Parcel EJ 254 970 851 was addressed to “Jessica Smith, 12721 Almeda Crossing Court, Houston, TX 77048,” with a return address of “Erick Thmoas, 27040 Carrington, Pl., Harrison Township, MI 48045.” The parcel weighed 13 pounds 2 ounces and bore \$112.50 in postage and fees. A query of law enforcement databases revealed that Erick Thmoas is not known to be associated with the Carrington Pl. address.

A. Photographs of the outside of Parcel EJ 254 970 851





4. On June 25, 2020, a law enforcement canine conducted a sniff test of the subject parcel. The canine positively alerted to the odor of controlled substances in the parcel. On June 26, 2020, postal inspectors executed a search warrant of the parcel and found inside it a Louis Vuitton box with \$95,980 in U.S. currency.

B. Photographs of the contents of Parcel EJ 254 970 851





5. Further investigation revealed that an individual named ERICK MILLER is associated with 27040 Carrington Pl., Harrison Township, MI 48045 and 6366 Memorial Ave, Detroit, MI 48045.

6. In addition to MILLER's association with the Carrington Pl. address, the IP addresses used to track the status of that parcel were used to track several other parcels that had been shipped to Michigan from the Houston area. These parcels also had names that were not associated with the listed addresses. This information led USPIS to believe that the addresses were likely being used to receive controlled substances. Therefore, a USPIS inspector set up "mail watches" on the following addresses, which would in turn notify USPIS when a parcel was being mailed to one of them.

- 20014 Greenlawn, Detroit, MI 48221
- 6366 Memorial Ave, Detroit, MI 48228

- 6852 Memorial Ave, Detroit, MI 48228
7. In addition, law enforcement databases revealed that MILLER had two vehicles registered to him: a 2018 Cadillac XT5 SUV, with Michigan plate DWW6741, and a 2008 Cadillac Escalade, with MI plate DLP2940. USPIS agents also learnt that on July 31, 2020, MILLER had submitted a change of address from 27040 Carrington Place, Harrison Township, MI 48045 to 6366 Memorial Ave, Detroit, MI 48228.

C. Forensic Evidence Pertaining to Parcel EJ 254 970 851

8. Subsequent forensic analysis revealed two fingerprints belonging to MILLER on the exterior of the Louis Vuitton box. Further, four of MILLER'S fingerprints were found on the non-adhesive side of the Priority Mail Express tape on the parcel. And one fingerprint and palm print were each found on the adhesive side of the Priority Mail Express label.

II. Interdiction of Parcel 9505 5130 1992 0294 2561 73

9. On October 21, 2020, postal inspectors received a mail-watch notification about a priority mail parcel bearing tracking number 9505 5130 1992 0294 2561 73, which had been mailed from Houston and was addressed to 6366 Memorial, Detroit, MI 48228. This parcel weighed about 3 pounds 5 ounces. The intended recipient address had been previously identified as receiving suspicious parcels from the Houston area and was an

address associated with MILLER. Moreover, the return address of “Ms. Tate, 1218 Cavalcade, Houston, TX 77026” was fictitious.

10. On October 23, 2020, a canine positively alerted to Parcel 9505 5130 1992 0294 2561 73. After that, postal officers attained and executed a federal search warrant on it. The execution led to the discovery of approximately 1,200 grams of suspected cocaine inside. The cocaine was packaged in a vacuum-sealed, black bundle with the marking “CIELO” on it.

A. Photographs of the contents and exterior of Parcel 9505 5130 1992 0294 2561 73





**B. Forensic Evidence Pertaining to Parcel 9505 5130 1992 0294
2561 73**

11. On September 30, 2021, postal inspectors received a fingerprint analysis report from an MSP forensic lab for the parcel. The report identified one fingerprint belonging to a Victoria Denise JACKSON, DOB: xx/xx/1972, located on a piece of bubble wrap inside the parcel.

**C. Travel Evidence Pertaining to Parcel 9505 5130 1992 0294
2561 73**

12. According to travel records, MILLER traveled to Houston, TX on October 15, 2020, and returned to Detroit, MI October 19, 2020. The timing of this travel directly coincides with the shipment of the parcel, which was sent from Texas to Michigan on October 20, 2020.

III. Interdiction of Parcel EE 213 993 827

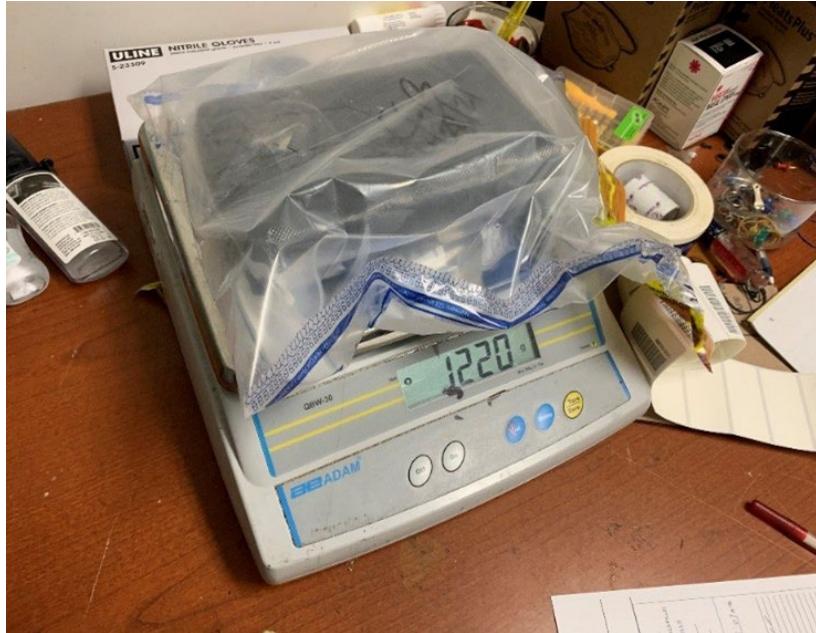
13. On April 27, 2021, the USPIS interdicted an inbound parcel addressed to “Mike Thomas, 27040 Cattington Pl., Harrison Township, MI 48045” (the address was not clearly legible and is suspected to be intended as “Carrington”). As noted, 27040 Carrington Pl. is an address associated with MILLER. According to postal and law-enforcement databases, there is no individual named “Mike Thomas” associated with this address. The listed return address: “L. Johnson, 3003 Seagler Road, Houston, TX 77042” has no individual named L. Johnson associated with the address. This parcel was mailed on April 26, 2021, from a post office within the 77098-zip code, associated with Houston, TX. The parcel weighed 4 pounds and 14.4 ounces and displayed \$69.25 in postage and fees.

14. On April 27, 2021, a border-patrol agent and his narcotics-detecting canine conducted a sniff test of this parcel. The canine positively alerted on the parcel. Subsequently, USPIS officers executed a federal search warrant on it. Inside the parcel, there was another brown box, which contained a plastic container. From that plastic container, officers seized 1220 grams of cocaine.

A. Photographs of Parcel EE 213 993 827







B. Forensic Evidence Pertaining to Parcel EE 213 993 827

15. Forensic examination of parcel EE 213 993 827 revealed three fingerprints belonging to MILLER on the non-adhesive side of the priority mail express label. The report also identified two fingerprints and two palm prints belonging to MILLER on the exterior of the priority mail express box. The report additionally identified one fingerprint belonging to MILLER on the exterior of the brown box inside the priority mail express parcel and one fingerprint on the adhesive side of the clear tape from the brown box. Two of MILLER's fingerprints were also found on the clear plastic container inside the box. The report additionally identified four of MILLER's fingerprints on the exterior of the white Guanajuato Supermarket grocery bag inside the box.

C. Travel Evidence Pertaining to Parcel EE 213 993 827

16. Subsequent analysis of MILLER'S flight records revealed that MILLER flew from Detroit, MI to Houston, TX on April 20, 2021 and returned to Detroit, MI from Houston, TX on April 27, 2021. These dates coincide with a timeline that would allow MILLER to travel from Michigan to Texas and return in time to receive a shipment of suspected narcotics because the alleged shipment of narcotics from Houston to Detroit was sent on April 26, 2020—i.e., a day prior to MILLER's return flight.

IV. Controlled Delivery of Parcel EJ 880 006 987

17. On November 30, 2021, USPIS interdicted a parcel with tracking number EJ 880 006 987 in a holiday-themed box. It was addressed to "Timothy Webb at 6852 Memorial, Detroit, MI 48228." This address is on the same street on which MILLER lives. The return address was to "Tammie Webb Thomas" at "1212 Lockwood #101 Houston, Texas 77026."

18. This parcel was mailed on November 29, 2021 from a post office within the zip code of 77026, which associated with Houston, TX. It weighed approximately 3 pounds and .5 ounces and listed \$63.00 in postage and fees. In addition, postal databases showed that "Tamie Webb Thomas" had no known association with the listed return address. The databases also revealed that Timothy WEBB was associated with the destination address.

19. On November 30, 2021, a narcotics-detecting canine conducted a sniff test of the parcel. The canine positively alerted to the odor of controlled substances. On December 1, 2021, postal inspectors executed a federal search warrant and seized about 1040 grams of cocaine from the parcel.

20. On December 8, 2021, a controlled delivery was conducted. First, postal inspectors and agents with the DEA filled parcel EJ 880 006 987 with “sham.” Next, they delivered the box of sham to 6852 Memorial Avenue, Detroit MI 48228, the address where the parcel was originally intended and the registered address of Timothy WEBB. Postal inspectors and the DEA then conducted surveillance of this address. At around 1:15 p.m., they saw a black Cadillac XTS arrive at the address. Agents identified the occupants of the car as WEBB and MILLER, and they saw WEBB and MILLER exit the Cadillac and go into WEBB’S home.

21. At approximately 1:25 p.m., a postal inspector obtained the license plate for the Black Cadillac XTS bearing Michigan plate DWW 6741 and saw that it was registered to MILLER. At approximately 1:34 p.m., agents saw MILLER leave WEBB’s home with the parcel. They then saw MILLER place the parcel into the Cadillac XTS and drive away from the home. Soon after, a Michigan State Police Trooper conducted a traffic stop of MILLER

and arrested him. Law enforcement officers searched MILLER'S car and found the parcel EJ 880 006 987 inside.

A. Photographs of Controlled Delivery of Parcel EJ 880 006 987



B. Forensic Evidence Pertaining to Parcel EJ 880 006 987

20. A later forensic examination of this parcel revealed one fingerprint belonging to JACKSON on the bubble wrap inside of the parcel.

D. Interview

22. On December 8, 2021, USPIS interviewed Timothy WEBB. During this interview, WEBB admitted that he allowed MILLER to use his address to receive parcels. WEBB additionally recalled MILLER traveling to Las Vegas, NV, Houston, TX, and CA. Additionally, WEBB stated that MILLER never offered WEBB any form of payment in exchange for using his home to receive mail. WEBB added that he has known MILLER for approximately six years and had allowed MILLER to receive a package at his home one other time.

CONCLUSION

25. Based upon the foregoing, it is probable that Erick Lionel MILLER committed a violation of 21 U.S.C. § 841 (a)(1) Possession with Intent to Distribute Controlled Substances (cocaine). Accordingly, the affiant respectfully request this Court issue a complaint and arrest warrant.

Respectfully submitted,



Keith Humphries
Postal Inspector, U.S.P.I.S.

Sworn to before me in my presence and/or
By reliable electronic means.



Hon. Kimberly G. Altman
United States Magistrate Judge

Dated: November 20, 2023